

Drafting and Issuing Discovery Subpoenas: Maryland

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A Q&A guide to drafting, issuing, serving, and enforcing a discovery subpoena in a Maryland civil proceeding. This Q&A addresses the state statutes and rules governing discovery subpoenas, the types of discovery subpoenas available, the requirements for drafting and serving a discovery subpoena, and the methods of enforcing a discovery subpoena. Answers to questions can be compared across a number of jurisdictions (see [Drafting and Issuing Discovery Subpoenas: State Q&A Tool](#)).

OVERVIEW OF DISCOVERY SUBPOENAS

1. What are the laws or rules in your jurisdiction that generally govern subpoenas to non-party witnesses in discovery?

Discovery subpoenas are generally governed by the Maryland Rules, and in some cases by particular statutes in the Maryland Code.

MARYLAND RULES GOVERNING DISCOVERY SUBPOENAS

- Circuit Court Subpoenas:
 - Md. Rule 2-510 (subpoenas generally).
 - Md. Rule 2-510.1 (foreign subpoenas in conjunction with a deposition).
 - Md. Rule 2-402 (scope of discovery).
 - Md. Rule 2-403 (protective orders).
 - Md. Rule 2-411 to 2-419 (deposition procedure).
 - Md. Rule 2-422.1 (subpoenas to obtain entry and inspect designated land or property).
 - Md. Rule 2-431 (required good faith efforts to resolve discovery disputes).
 - Md. Rule 2-432 (motions upon failure to provide discovery).

- Md. Rule 2-433 (sanctions).
- Md. Rule 2-434(b) (expenses for failure to subpoena witness).
- District Court Subpoenas: Md. Rule 3-510 (subpoenas generally).

STATUTES GOVERNING DISCOVERY SUBPOENAS

- Md. Code Ann., Cts. & Jud. Proc. §§ 3-217 and 3-218 (subpoenas and depositions during arbitration).
- Md. Code Ann., Cts. & Jud. Proc. § 6-410 (subpoenas for custodians of public records).
- Md. Code Ann., Cts. & Jud. Proc. §§ 9-401 – 9-407 (Maryland Uniform Interstate Depositions and Discovery Act).
- Md. Code Ann., Fin. Inst. § 1-304 (disclosure of financial records in compliance with subpoena).
- Md. Code Ann., Health-Gen. § 4-306 (mandatory disclosure of medical record without authorization).

2. Please identify and describe the different types of discovery subpoenas available in your jurisdiction (for example, document subpoenas, subpoenas for deposition only, or combined deposition and document subpoenas).

SUBPOENA FOR DEPOSITION AND TO PRODUCE DOCUMENTS AT DEPOSITION

A party may obtain a subpoena to compel a non-party to attend and give testimony at a deposition in connection with a civil action in the circuit court or district court (Md. Rule 2-510(a)(1)(B) and 3-510(a)(1)(B)). Deposition subpoenas may also require a non-party deponent to produce documents, electronically stored information, or other tangible things at the deposition (Md. Rule 2-412(c), 2-510(a)(1)(B), and 3-510(a)(1)(B)). A subpoena that requires both attendance at a deposition and production of documents is called a subpoena *duces tecum*.

In practice, attorneys who wish to subpoena only documents from a non-party sometimes serve a subpoena *duces tecum* and state in the notice of deposition that attendance at the deposition will be excused if the documents are produced in advance of the deposition date. However, a party who excuses a deponent in this manner must notify the other parties (who have a right to inspect the documents at the deposition under the subpoena as issued) of the withdrawal of the subpoena, or be exposed to a motion for expenses by any party who

attends the noticed deposition for failure to ensure that the witness attends (Md. Rule 2-434(b)).

SUBPOENA TO ENTER AND INSPECT PROPERTY

A party may obtain a subpoena to enter and inspect designated land or property owned by or in the possession or control of a non-party in connection with a civil action in the circuit court (Md. Rule 2-422.1(a)).

3. Who has the authority to issue a discovery subpoena?

A civil discovery subpoena must be issued by the clerk of the court in which the action is pending (Md. Rule 2-422.1(c)(1), 2-510(b), and 3-510(b)).

In practice, however, the process has been streamlined so that attorneys can immediately obtain properly issued blank subpoenas for service. On the request of an attorney entitled to issuance of a subpoena, the clerk must issue a signed and sealed but otherwise blank subpoena which the attorney must fill in before service (Md. Rule 2-422.1(c)(1), 2-510(b)(2), and 3-510(b)(2)). An attorney of record in a pending action who is a registered e-filing user under Maryland Rule 20-101 may obtain from the clerk through the Maryland Electronic Courts (MDEC), for use in that action, an electronic blank subpoena form containing the clerk's signature and the seal of the court, which the attorney may download, print, and fill in before service (Md. Rule 2-510(b)(3) and 3-510(b)(3)).

For self-represented litigants, the clerk must issue a subpoena in paper form. On the request of any person entitled to the issuance of a subpoena (a party or the attorney of record), the clerk must either:

- Issue a completed subpoena.
- Provide a blank subpoena form, which the person must fill in and return to the clerk to be signed and sealed by the clerk before service.

(Md. Rule 2-422.1(c)(1), 2-510(b)(1), and 3-510(b)(1).)

A party in an out-of-state proceeding who is requesting a Maryland subpoena must request issuance of a subpoena by submitting a foreign subpoena to the clerk of the circuit court for the county in which discovery is sought. The clerk then issues a Maryland subpoena that incorporates the terms of the foreign subpoena. (Md. Code Ann., Cts. & Jud. Proc. § 9-402; Md. Rule 2-510.1.)

4. Are there any situations when a discovery subpoena must be issued from a court?

A civil discovery subpoena must be issued by the clerk of the court in which the action is pending (Md. Rule 2-422.1(c)(1), 2-510(b), and 3-510(b)).

A court order is required to obtain mental health records (Md. Code Ann., Health-Gen. § 4-307(k)(1)(iv), (v)). Additionally, if a party is seeking to obtain medical records of a person who objects to the disclosure of their medical records, a party must obtain either:

- A court order that expressly authorizes the disclosure of medical records.
- Proof that the court waived service of the subpoena for good cause.

(Md. Code Ann., Health-Gen. § 4-306(b)(6).)

DRAFTING A DISCOVERY SUBPOENA

5. What information must be included in each type of discovery subpoena?

SUBPOENA FOR DEPOSITION AND TO PRODUCE DOCUMENTS AT DEPOSITION

Except as otherwise permitted by the court for good cause, every subpoena must be on a uniform form approved by the State Court Administrator (Md. Rule 2-510(c) and 3-510(c)). The form must contain:

- The caption of the action.
- The name and address of the person to whom it is directed.
- The name of the person at whose request it is issued.
- The date, time, and place where attendance is required.
- A description of any documents, electronically stored information, or tangible things to be produced. In circuit court only, a subpoena may specify the form in which electronically stored information is to be produced.
- In circuit court only, if testing or sampling is to occur, a description of the proposed testing or sampling procedure.
- When required by Md. Rule 2-412(d), a notice to designate the person to testify.
- The date of issuance.
- A statement that the subpoena may be served within 60 days after its issuance and may not be served thereafter.

(Md. Rule 2-510(c) and 3-510(c).)

Additional Requirements for Subpoena to Obtain Financial Records

A subpoena served on a fiduciary institution to compel the production of financial records or information derived from financial records must contain a certification that either:

- The party seeking production has served a copy of the subpoena on the person whose records are sought.
- The court waived the service requirement for good cause.

(Md. Code Ann., Fin. Inst. § 1-304.)

Additional Requirements for Subpoena to Obtain Medical Records

Unless the court orders otherwise, before serving a healthcare provider with a subpoena to compel the production of medical records, a party must first send the person whose medical records are sought:

- A notice, in the form set out in Md. Code Ann., Health-Gen. § 4-306(b)(6)(iii).
- The subpoena duces tecum issued for the medical records.
- A copy of Section 4-306 of the Health-General Article of the Maryland Code.

(Md. Code Ann., Health-Gen. § 4-306(b)(6)(ii), (iii).)

A subpoena served on the healthcare provider must contain either:

- A written assurance from the party or the attorney for the party seeking production that either:

- the person in interest has not objected to the disclosure of designated medical records within 30 days after notice was sent; or
 - the objections of the person in interest have been resolved, and the request for disclosure is in accordance with the resolution.
- Proof that service of the subpoena has been waived by the court for good cause.
 - A copy of a court order expressly authorizing disclosure of the designated medical records.

(Md. Code Ann., Health-Gen. § 4-306(b)(6).)

SUBPOENA TO ENTER AND INSPECT PROPERTY

Except as otherwise provided by the court for good cause, every subpoena must be on a uniform form approved by the State Court Administrator (Md. Rule 2-422.1(d)). The form must contain:

- The caption of the action, including the civil action number for the Maryland court issuing the subpoena.
- The name and address of the person to whom it is directed.
- The name of the person at whose request it is issued.
- A reasonably particular description of the land or property to be entered and any actions to be performed.
- A statement of the nature of the dispute and why entering and inspecting property is relevant.
- The time and manner of entering and inspecting.
- A description of the good faith attempts made by the party to reach agreements and with the person to whom the subpoena is directed concerning the entry and inspection.
- The date of issuance.
- A statement that the subpoena may be served within 60 days after its issuance and may not be served later.

(Md. Rule 2-422.1(d).)

The subpoena must also be accompanied by:

- A written undertaking that the requesting party will pay for all damages arising out of the entry and inspection.
- A notice informing the person to whom the subpoena is directed that:
 - the person has the right to object to the entry and inspection by filing an objection with the court and serving a copy of it on the requesting party;
 - any objection must be filed and served within 30 days after service; and
 - the objection must include or attach a certificate of service, stating the date on which the person mailed a copy of the objection to the requesting party.

(Md. Rule 2-422.1(d).)

6. Are there any official forms for any of the different types of discovery subpoenas?

A uniform, statewide subpoena form is available to registered users on the Maryland Electronic Courts (MDEC) portal. The instructions to access the subpoena form electronically are available at the

Maryland Courts website. Attorneys may also obtain the paper form from the court. Self-represented litigants must obtain the paper form from the appropriate court. (See Maryland Courts: Statewide Uniform Subpoena Form.)

SERVING A DISCOVERY SUBPOENA

7. Who may serve a discovery subpoena?

In general, a subpoena may be served by:

- A sheriff of any county in Maryland.
- Any person not a party who is not less than 18 years of age.

(Md. Rule 2-422.1(e), 2-510(d), and 3-510(d).)

8. Are there any restrictions on who may be served with a discovery subpoena?

A Maryland subpoena may not be served on non-parties outside of Maryland (*Attorney Grievance Comm'n of Maryland v. Mixter*, 109 A.3d 1, 9 (Md. 2015)).

Parties can be served with a subpoena, but as a matter of practice, this is not necessary because Maryland discovery rules require parties to engage in discovery without the need for a subpoena (see Md. Rule 2-401 to 2-434).

9. How is a discovery subpoena served on a non-party witness?

A discovery subpoena may be served on a non-party witness by either:

- Delivering a copy in person to:
 - the person named; or
 - an agent authorized by appointment or by law to receive service for the person named.
- Certified mail requesting: "Restricted Delivery--show to whom, date, address of delivery."

(Md. Rule 2-422.1(e), 2-510(d), and 3-510(d).) The appropriate recipient of personal delivery of a subpoena depends on whether the non-party witness is an individual or an entity. If the non-party is an entity, the service recipient differs depending on which type of entity the non-party is.

INDIVIDUALS

A party may serve a subpoena on an individual non-party witness by serving either:

- The individual.
- The individual's attorney, if the individual is represented.
- An agent authorized by appointment or by law to receive service for the individual.

(Md. Rule 2-124(b), 2-422.1(e), 2-510(d), and 3-510(d)). If an individual is disabled, service is made by serving both:

- The disabled individual.
- The parent, guardian, or other person having care or custody of the person or estate of the disabled individual.

(Md. Rule 2-124(c).)

CORPORATION, INCORPORATED ASSOCIATION, OR JOINT STOCK COMPANY

A party may serve a subpoena on a corporation, incorporated association, or joint stock company by serving:

- Its resident agent, president, secretary, or treasurer.
- The manager, any director, vice president, assistant secretary, assistant treasurer, or other person expressly or impliedly authorized to receive service of process, if no resident agent exists or if a good faith attempt to serve the resident agent, president, secretary, or treasurer has failed.

(Md. Rule 2-124(d).)

GENERAL PARTNERSHIP

A party may serve a subpoena on a general partnership by serving any general partner (Md. Rule 2-124(e); Md. Code Ann., Cts. & Jud. Proc. § 6-406).

LIMITED PARTNERSHIP

A party may serve a subpoena on a limited partnership by serving:

- Its resident agent.
- Any general partner or other person expressly or impliedly authorized to receive service of process, if no resident agent exists or if a good faith attempt to serve the resident agent has failed.

(Md. Rule 2-124(f).)

LIMITED LIABILITY PARTNERSHIP

A party may serve a subpoena on a limited liability partnership by serving:

- Its resident agent.
- Any other person expressly or impliedly authorized to receive service of process, if no resident agent exists or if a good faith attempt to serve the resident agent has failed.

(Md. Rule 2-124(g).)

LIMITED LIABILITY COMPANY

A party may serve a subpoena on a limited liability partnership by serving:

- Its resident agent.
- Any member or other person expressly or impliedly authorized to receive service of process, if no resident agent exists or if a good faith attempt to serve the resident agent has failed.

(Md. Rule 2-124(h).)

UNINCORPORATED ASSOCIATION

A party may serve a subpoena on an unincorporated association by serving:

- Any officer or member of its governing board.
- Any member of the association, if there are no officers or if the association has no governing board.

(Md. Rule 2-124(i); Md. Code Ann., Cts. & Jud. Proc. § 6-406.)

STATE OF MARYLAND

A party may serve a subpoena on the State of Maryland by serving the Attorney General or an individual designated by the Attorney General (Md. Rule 2-124(j)).

OFFICER OR AGENCY OF THE STATE OF MARYLAND

A party may serve a subpoena on an officer or agency of the State of Maryland by serving:

- The resident agent designated by the officer or agency.
- The Attorney General or an individual designated by the Attorney General.

(Md. Rule 2-124(k).) If service is made on the Attorney General or a designee of the Attorney General and the officer or agency is not ordinarily represented by the Attorney General, the Attorney General or designee must promptly forward the subpoena to the appropriate officer or agency (Md. Rule 2-124(k)).

LOCAL PUBLIC ENTITY

A party may serve a subpoena on a county, municipal corporation, bicounty or multicounty agency, public authority, special taxing district, or other political subdivision or unit of a political subdivision of the State of Maryland by serving:

- The resident agent designated by the local entity.
- If the local entity has no resident agent or if a good faith effort to serve the resident agent has failed:
 - the chief executive or presiding officer; or
 - any member of the governing body, if there is no chief executive or presiding officer.

(Md. Rule 2-124(l).)

UNITED STATES AND ITS OFFICERS OR AGENCIES

A party may serve a subpoena on the United States by serving both:

- The United States Attorney for the District of Maryland or his designee.
- The Attorney General of the United States.

(Md. Rule 2-124(m).) A party may serve an officer or agency of the United States, including a government corporation, by serving both the United States and the officer or agency (Md. Rule 2-124(n)).

SUBSTITUTED SERVICE ON STATE DEPARTMENT OF ASSESSMENTS AND TAXATION

A party may serve a subpoena on a corporation, limited partnership, limited liability partnership, limited liability company, or other entity required by Maryland statute to have a resident agent by serving two copies of the subpoena on the State Department of Assessments and Taxation if either:

- The entity has no resident agent.
- The resident agent is dead or is no longer at the address for service of process maintained with the State Department of Assessments and Taxation.
- Two good faith attempts on separate days to serve the resident agent have failed.

(Md. Rule 2-124(o).)

CUSTODIANS OF PUBLIC RECORDS

If a party seeks to subpoena a custodian of public records, but the custodian of public records is not known and cannot be ascertained after reasonable effort, the party may request a court to issue a subpoena for the custodian of public records to be served on either:

- A resident agent designated under § 1-1301 of the Local Government Article for service on a local entity.
- A resident agent designated under § 6-109 of the State Government Article for service on a State agency that is not represented by the Attorney General.
- The Attorney General or an individual designated by the Attorney General as provided under the Maryland Rules for service on a State agency that is represented by the Attorney General.

(Md. Code Ann., Cts & Jud. Proc. § 6-410.)

10. How far in advance must the issuing party serve a discovery subpoena on a non-party witness before the compliance date stated in the subpoena (for example, a specific number of days before the compliance date or a reasonable time before the compliance date)?

The Maryland Rules specify the following time frames for service:

- A deposition subpoena must be served at least ten days before the date of the deposition (Md. Rule 2-412(a)).
- A subpoena to produce documents at the deposition must be served at least 30 days before the date of the deposition (Md. Rule 2-412(c)).
- A subpoena to enter and inspect property must be served at least 45 days before the date of a requested entry (Md. Rule 2-422.1(e)).

Additionally, a subpoena may not be served more than 60 days after the date of issuance (Md. Rule 2-510(c) and 3-510(c)).

11. When and how must the issuing party notify other parties in the case that a discovery subpoena will be or has been served on a non-party witness? If no notice of that kind is required, please state that in your answer.

NOTICE OF SUBPOENA FOR DEPOSITION AND TO PRODUCE DOCUMENTS AT DEPOSITION

The issuing party must serve a notice of deposition, which constitutes “discovery material”, on all other parties (Md. Rule 2-401(d); see also *McCauley v. Suls*, 716 A.2d 1129, 1131 n.1 (Md. Ct. Spec. App. 1998) (holding that serving subpoena on non-party witness without notice of deposition to parties was improper “ex parte” subpoena)). The issuing party must serve the notice of deposition:

- At least ten days before the date of the deposition, if the subpoena does not require the production of documents.
- At least 30 days before the date of the deposition, if the subpoena requires the production of documents.

(Md. Rule 2-412(a), (c).) In practice, the subpoena is often served on all parties with the notice of deposition.

NOTICE OF SUBPOENA TO ENTER AND INSPECT PROPERTY

Before the issuing party serves a subpoena to enter and inspect property on the non-party witness, the party must serve a copy of the subpoena on each other party in the manner provided by Md. Rule 1-321 and file a certificate of service with the court (Md. Rule 2-422.1(e)).

12. Are there any territorial limits for service of a discovery subpoena? If so, please describe:

- Any limits on service within the state.
- Any limits on service outside the state.
- The procedure for obtaining discovery from a non-party witness located outside of the issuing court’s jurisdiction.

IN-STATE LIMITS ON SERVICE

A Maryland subpoena may be served on a non-party anywhere in Maryland (see *Mixter*, 109 A.3d at 7-9 (citing *Niemeyer & Schuett*, Rule 2-413, Maryland Rules Commentary 297 (3d ed. 2003, 2013 Supp.)).

A non-party who is a Maryland resident may be required to attend a deposition in the state only:

- In the county in which the person:
 - resides;
 - is employed; or
 - is engaged in business.
- At any other convenient place specified by court order.

(Md. Rule 2-413(a)(1).) A non-party who is a non-resident may be required to attend a deposition in Maryland only:

- In the county in which the non-resident is served with a subpoena.
- Within 40 miles from the place of service.
- At any other convenient place fixed by court order.

(Md. Rule 2-413(a)(1).)

OUT-OF-STATE LIMITS ON SERVICE

In general, Maryland subpoenas may not be served outside of Maryland (*Mixter*, 109 A.3d at 9).

OBTAINING DISCOVERY LOCATED OUTSIDE ISSUING COURT’S JURISDICTION

A party seeking discovery outside the issuing court’s jurisdiction must follow the procedures of the place in which discovery is sought.

If the state in which discovery is sought has adopted the Uniform Interstate Depositions and Discovery Act (UIDDA), which Maryland has adopted, the party must submit a Maryland subpoena to the clerk of the county in which discovery is sought. The clerk then promptly issues a subpoena for service on the applicable subpoena recipient. (See, for example, Md. Code Ann., Cts. & Jud. Proc. §§ 9-401 to 9-407 (the Maryland UIDDA).)

If the foreign state has not adopted the UIDDA, the party should consult the laws of the foreign state to determine how to obtain

discovery from a witness residing in that state. Depending on the foreign state's law, the party may be required to:

- Obtain a commission or letters rogatory from the Maryland court for submission to the foreign court.
- File a miscellaneous action in the foreign state court.
- Comply with the foreign state's own procedures as if the suit had been brought there.

WITNESS FEES

13. What are the applicable witness fees for a deposition in your state? In particular, please describe:

- How the fees are calculated.
- In what form fees are paid (for example, cash or check).
- When the fees must be paid.
- The consequences for failing to pay the fees.
- There are no witness fees for depositions of fact witnesses in Maryland.

ENFORCING A DISCOVERY SUBPOENA

14. What are the available methods for enforcing a discovery subpoena against a non-party witness (for example, motion to compel, motion for contempt)?

GOOD FAITH ATTEMPT TO RESOLVE DISPUTE

If the witness fails to comply with or objects to a subpoena, the issuing party must first attempt to contact the subpoenaed witness or the witness's attorney and attempt to resolve the dispute before filing a motion to compel or a motion for sanctions. Maryland courts require that a discovery motion include a certificate:

- Describing the good faith attempts to discuss with the opposing attorney the resolution of the dispute.
- Detailing the date, time, and circumstances of each discussion or attempted discussion.
- Certifying that they are unable to reach agreement on the disputed issues.

(Md. Rule 2-431.)

MOTION TO COMPEL

The discovering party may move for an order compelling discovery from a non-party if a witness:

- Fails to answer a question asked in an oral or written deposition (Md. Rule 2-432(b)(1)(B)).
- Fails to produce designated documents without filing a written objection (Md. Rule 2-432(b)(1)(C)).
- Refuses to permit or objects to entry on designated land (Md. Rule 2-422.1(f)(2)).

The discovering party must provide reasonable notice of a motion to compel to the parties and all persons affected (Md. Rule 2-432(b)(1)).

MOTION FOR SANCTIONS

The discovering party may file a motion for sanctions if a non-party fails to obey an order compelling discovery (Md. Rule 2-433(c)). Available sanctions include court orders:

- That certain matters sought to be discovered or other designated facts be taken as established in the case.
- Prohibiting a party from supporting or opposing claims or defenses or from introducing certain matters in evidence.
- Striking pleadings or parts of pleadings.
- Staying the case until discovery is provided.
- Dismissing a claim or the case as a whole.
- Entering a default judgment on some or all claims.
- Requiring the payment of reasonable costs, expenses, and/or attorneys' fees.

(Md. Rule 2-433(a).)

The court may also enter an order in compliance with Md. Rule 15-206 treating the failure to obey the order as an act of contempt (Md. Rule 2-433(c)).

A witness served with a subpoena may also be subject to body attachment (civil arrest) and a fine for failure to obey the subpoena without sufficient excuse (Md. Rule 2-510(j)).

APPEALING A COURT DECISION ON A DISCOVERY SUBPOENA

15. May a court's decision concerning a discovery subpoena be appealed? If so, please indicate:

- Whether the decision may be appealed.
- When the decision may be appealed.
- The standard of review for an appeal.

APPEALABILITY

Parties generally cannot appeal interlocutory discovery orders except under extremely limited circumstances, such as where the order:

- Conclusively determines the disputed question.
- Resolves an important issue.
- Resolves an issue that is completely separate from the merits of the action.
- Would be effectively unreviewable on appeal from a final judgment.

(*St. Joseph Med. Ctr., Inc. v. Cardiac Surgery Assocs., P.A.*, 896 A.2d 304, 310 (Md. 2006).)

A non-party witness, however, may appeal a trial court's discovery order because it is effectively a final disposition with respect to that appellant (*St. Joseph Med. Ctr., Inc.*, 896 A.2d at 313; *Forensic Advisors, Inc. v. Matrixx Initiatives, Inc.*, 907 A.2d 855, 860 (Md. Ct. Spec. App. 2006)).

TIMING OF APPEAL

The notice of appeal must be filed within 30 days after entry of the order from which the appeal is taken (Md. Rule 8-202; Md. Code Ann., Cts. & Jud. Proc. § 12-401(e)).

STANDARD OF REVIEW

The standard of review is abuse of discretion (see *Forensic Advisors, Inc.*, 907 A.2d at 861 n.6).

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